

1                   IN THE UNITED STATES DISTRICT COURT  
2                   CENTRAL DISTRICT OF CALIFORNIA  
3

4       DOUGLAS TROESTER, on behalf                   )  
5       of himself, and all others                   )  
6       similarly situated,                   )  
7                                   Plaintiffs,                   )  
8                                   vs.                   ) No.  
9       STARBUCKS CORPORATION, a                   ) 2:12-CV-07677-GAF-  
10      Washington corporation; and                   ) PJW  
11      DOES 1-50, inclusive,                   )  
12                                   Defendants.                   )  
13       \_\_\_\_\_

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16  
17       Deposition of PAUL B. O'LEARY, taken  
18       at 2208 North 30th Street, Tacoma,  
19       Washington, commencing at 10:20 a.m.,  
20       Friday, January 24, 2014, before  
21       Christy Sheppard, CCR, RPR.  
22  
23

24       JOB No. 1800937

25       PAGES 1 - 69

Veritext National Deposition & Litigation Services  
866 299-5127

1 Q (By Mr. Benowitz) And so aside from the ones with the  
2 till, are there other ones that have to be done before  
3 others as part of the training?

4 MR. CURIEL: Objection. Overbroad.  
5 Go ahead.

6 THE WITNESS: Yeah, you couldn't --  
7 you can't arm the alarm system before you run store  
8 close. You can't -- we are trained to clock out after  
9 you have run store close. And those are really the ones  
10 we are trained to do.

11 So, for example, I could theoretically do a final  
12 walkthrough of the store before I run store close, but we  
13 are trained specifically to run store close and then  
14 clock out and then arm the alarm system.

15 Q (By Mr. Benowitz) And how long does arming the alarm  
16 system take?

17 A Five seconds.

18 Q And lock and leaving the store?

19 A Twenty seconds.

20 Q Do any of these ever take longer?

21 A Again, depending on the size of the store, but you are  
22 walking from the back of the store to the front of the  
23 store, so it's less than a minute.

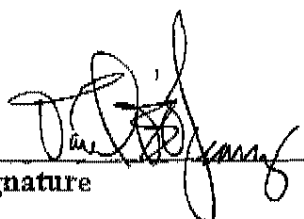
24 Q Locking doors?

25 A A second. You are just turning the key. You are just

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\_\_\_\_\_ Subject to the above changes, I certify that the transcript is true and correct.

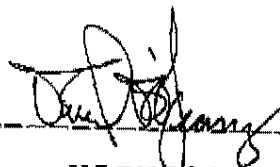
X No changes have been made. I certify that the transcript is true and correct.

  
\_\_\_\_\_  
Signature

FEBRUARY 3, 2014  
\_\_\_\_\_  
Date

1 I declare under penalty of perjury  
2 under the laws that the foregoing is  
3 true and correct.  
4

5 Executed on February 3, 2014,  
6 at Thon, WASHINGTON  
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11

12 WITNESS SIGNATURE  
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1 STATE OF WASHINGTON ) I, CHRISTY SHEPPARD,  
 ) ss CCR #1932, a duly  
 2 County of Pierce ) Certified Court  
 Reporter in and for the  
 3 State of Washington  
 residing at Buckley,  
 4 do hereby certify:  
 5  
 6

7 That the foregoing deposition of PAUL B.  
 O'LEARY was taken before me and completed on January 24,  
 8 2014, and thereafter was transcribed under my direction;  
 that the deposition is a full, true and complete  
 transcript of the testimony of said witness, including  
 9 all questions, answers, objections, motions and  
 exceptions;  
 10

11 That the witness, before examination, was by me  
 duly sworn to testify the truth, the whole truth, and  
 nothing but the truth, and that the witness reserved the  
 12 right of signature;

13 That I am not a relative, employee, attorney or  
 counsel of any party to this action or relative or  
 14 employee of any such attorney or counsel and that I am  
 not financially interested in the said action or the  
 15 outcome thereof;

16 That I am herewith securely sealing the said  
 deposition and promptly delivering the same to Attorney  
 17 Louis Benowitz.

18 IN WITNESS WHEREOF, I have hereunto set my hand  
 and affixed my official seal this 28th day of  
 19 January, 2014.  
 20  
 21  
 22



*Christy Sheppard*  
 Christy Sheppard, CCR, RPR  
 Certified Court Reporter in and for the  
 State of Washington, residing at Buckley.  
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 24  
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